



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 9, 2017

JANE LEIDERMAN, TREASURER
LEADERSHIP, INTEGRITY, ENGAGEMENT,
UNITY PAC
16633 VENTURA BLVD # 1008
ENCINO, CA 91436

Response Due Date
06/13/2017

IDENTIFICATION NUMBER: C00589309

REFERENCE: 30 DAY POST-GENERAL REPORT (10/20/2016 - 11/28/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. Your filings disclose that your committee may have satisfied the criteria set forth at 11 CFR §100.5(e)(3) for becoming a multicandidate committee; however, the Commission has no record of a FORM 1M (Notification of Multicandidate Status) filed by your committee. Please be advised that once a political committee meets the certification requirements or becomes affiliated with an existing multicandidate committee, whether or not that political committee has certified its status as a multicandidate committee, it automatically attains multicandidate status and must file a FORM 1M (Notification of Multicandidate Status) within ten (10) calendar days. The certification requirements for multicandidate status have been satisfied when a political committee:

- 1 - has received contributions for federal elections from at least 51 persons;
- 2 - has been registered with the Commission for at least 6 months; and
- 3 - has made contributions to at least five federal candidates.

For further guidance on the multicandidate certification requirements, please see 11 CFR §§102.2(a)(3), 110.2(a)(1) and (2). Please submit a FORM 1M to disclose the required information for the public record. A copy of FEC FORM 1M can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413.

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2. The totals listed on Line(s) 7, 21(b), 21(c), 31, and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

3. Line 21(b) of the Detailed Summary Page of your report discloses a total of \$25,820.15 in Other Federal Operating Expenditures. The sum of the entries itemized on Schedule B, however, indicates the total to be \$40,320.15. Please amend your report to clarify the discrepancy. (11 CFR § 104.3(a) and (b))

4. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2016 General election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

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Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

5. On Schedule B, you have disclosed disbursements to a federal candidate committee. Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, state of election, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the office sought (House, Senate, or President), and district (if applicable). (11 CFR §104.3 (b)(3))

6. Schedule B supporting Line 29 of your report discloses negative entries that appear to correspond to expenditures made during this or previous reporting periods. Please be advised that the receipt of offsets to operating expenditures should be disclosed on Schedule A supporting Line 15 of the Detailed Summary Page if the vendor wrote a refund/rebate check on its account. This method of reporting would clarify for the public record the total amount of receipts and more accurately disclose the cash-on-hand amount. Please amend your report to properly disclose this activity or provide clarifying information.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, Non Federal contributions should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report

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review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,

A handwritten signature in black ink, appearing to read "Romy Adame-Wilson". The signature is fluid and cursive, with the first name "Romy" being the most prominent.

Romy Adame-Wilson
Senior Campaign Finance Analyst
Reports Analysis Division

Impermissible, Excessive, and Prohibited Contributions
LEADERSHIP, INTEGRITY, ENGAGEMENT, UNITY PAC (C00589309)

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election
Applegate for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Anthony Brown for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Cain for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Duckworth for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Eggman for Congress	11/22/16	\$2,000.00	G2016	11/8/2016
Joe Garcia for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Mike Honda for Congress	11/22/16	\$2,000.00	G2016	11/8/2016
Pramila for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Friends of Raja for Congress	11/22/16	\$1,000.00	G2016	11/8/2016
Schneider for Congress	11/22/16	\$1,000.00	G2016	11/8/2016